

Appendix D4 – Scientist Alternative – Don Waller

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| <div>Scientists' Alternative</div> <div>Don Waller, FS Diversity Options Workshop</div> <div><ul style="list-style-type: none">• 2002 Rule - what's right• Concerns<ul style="list-style-type: none">– NEPA - level of analysis and EIS– discretionary authority and standards– How should science be integrated?• Scientists' Option #3<ul style="list-style-type: none">– Follows Option 2 in general direction– Requires NEPA at Plan level to match level of analysis– Adds standard regarding species viability– Emphasizes monitoring in adaptive management cycle</div> | <div>Option 2 - what's right</div> <div><ul style="list-style-type: none">• Top-down, 'coarse filter' approach<ul style="list-style-type: none">– Seeks to protect diversity wholesale, not retail– Considers <i>contexts</i>: landscape & history– Identifies rare ecosystems & those at risk– Emphasis on restoration of diversity & conditions– Evaluates effects of human & natural disturbances– Stated emphasis on baselines, monitoring, and adaptive management• All needed, all great ideas</div> | | | | | | | | | |
| <div>Concerns - NEPA</div> <div><ul style="list-style-type: none">• NFMA, 1982, & 2000 Regs require EIS's for Plans, yet 2002 Reg 'categorically excludes' Plans from NEPA, instead requires EIS's for local Projects• Disadvantages:<ul style="list-style-type: none">– Plan is proper and most efficient time & spatial scale for analysis; clear & open process for science input– Proliferates EA's - less efficient than combined anal.<ul style="list-style-type: none">• Difficult to assess cumulative and regional impacts.• Fails to capitalize on broad-scale analyses in Option 2• Discourages input from the public and scientists• Scientists less inclined to work on small, local projects</div> | <div>Concerns - Discretion</div> <div><ul style="list-style-type: none">• FS responsibilities diminish• Program Officer is granted full authority:<ul style="list-style-type: none">•<table><tr><td></td><td>'Should'</td><td>'Must'</td></tr><tr><td>• 2000 Rule:</td><td>5</td><td>33</td></tr><tr><td>• 2002 Rule:</td><td>55</td><td>10</td></tr></table>• Higher discretionary authority 'streamlines', but open to abuse• Fewer clear <u>standards</u> and opportunities for <u>science input</u></div> | | 'Should' | 'Must' | • 2000 Rule: | 5 | 33 | • 2002 Rule: | 55 | 10 |
| | 'Should' | 'Must' | | | | | | | | |
| • 2000 Rule: | 5 | 33 | | | | | | | | |
| • 2002 Rule: | 55 | 10 | | | | | | | | |
| <div>Concern: Priorities</div> <div><ul style="list-style-type: none">• 2000 Regs: First priority: Ecological sustainability<ul style="list-style-type: none">– Clear prerequisite for social & econ sustainability<ul style="list-style-type: none">• Includes: biological diversity• Productivity & function of ecosystems;• Soil, air, & water quality• 2002 Regs: social, economic, & ecological<ul style="list-style-type: none">– Ignores what Comm of Scientists stressed:<ul style="list-style-type: none">• A primary need to first protect forests & watersheds</div> | <div>Concerns - Standards</div> <div><ul style="list-style-type: none">• Option #2 Standard:<ul style="list-style-type: none">– 'substantial reduction in abundance, extent, or distribution ... as a result of actions under the direct control of FS land managers'• Would require for any action:<ul style="list-style-type: none">– Overwhelming evidence of decline– Proof that such declines were due to FS management• Assumes: mgmt has no effects (until proved otherwise)• Ignores responsibility to assess or address declines <u>not</u> directly attributable to management<ul style="list-style-type: none">– Narrows concept of mgmt to ignore responsibility for biotic community (contra NFMA)</div> | | | | | | | | | |

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| <p style="text-align: center;">Proper role of science / scientists?</p> <ul style="list-style-type: none"> • Should scientists work closely with managers to <i>integrate</i> scientific results into management? • YES! according to: <ul style="list-style-type: none"> – Scientists (2003 BioScience 'Forum') – Managers – Interest Groups – Attentive Public who all agree <p style="text-align: center;">So consensus on role of science & scientists</p> | <p style="text-align: center;">Concern: Role of science/scientists</p> <ul style="list-style-type: none"> • 1982 & 2000 Regs convened Comm's of Scientists for input, not 2002 Regs. • 2000 Regs required outside scientific input, incl National & Regional Science Advisory Boards <ul style="list-style-type: none"> – Such boards are routine in other agencies (EPA) • 2002 Regs makes science discretionary: <ul style="list-style-type: none"> – No necessary NEPA at Plan level (219.6) – How & when to involve outside scientists (219.14) – How & when to monitor (219.11) |
| <p style="text-align: center;">Concerns: Roads & Land use</p> <ul style="list-style-type: none"> • Roads <ul style="list-style-type: none"> – Many impacts on diversity & sustainability – 2000 Regs: consider roadless areas for addtl protection – 2002 Regs: only consider such areas for wilderness • 2002 Regs 219.4(a)(4): <ul style="list-style-type: none"> – "NF lands generally available for a variety of uses" – Although zoning is allowed, return to old notion of presumed simultaneous multiple use – Ignores that uses compete & interfere with each other | <p style="text-align: center;">Concerns - Diversity targets</p> <ul style="list-style-type: none"> • Option 1 - focus on species viability <ul style="list-style-type: none"> – Narrow: 'native & desired non-native vertebrates and vascular plants' - but discretionary • Option 2 - focus on communities . . <ul style="list-style-type: none"> – Broad: 'native and desired non-native species' – Procedural - does not specify outcomes or stds – Flexible, but needs standards and 'ground truth' – Can't maintain communities/ecosystems without maintaining species, yet no viability requirement • Need to strengthen Opt 2 with standards and data |
| <p style="text-align: center;">Concerns - Monitoring</p> <ul style="list-style-type: none"> • Importance of monitoring <ul style="list-style-type: none"> – Need 'dashboard' data to indicate effects of mgmt – Field data needed to guide adaptive management – Field data needed to assess population / community / ecosystem viability / sustainability • Key role of monitoring species recognized in: <ul style="list-style-type: none"> – 1982 Regs: Mgmt Indicator Species – 2000 Regs: Focal Species, including: <ul style="list-style-type: none"> • Interacting, keystone, sensitive species | <p style="text-align: center;">Scientists' Option #3</p> <ul style="list-style-type: none"> • Retain Ecological Sustainability as #1 priority <ul style="list-style-type: none"> – Informed ecological management is key • Apply the best science <ul style="list-style-type: none"> – Use general principles / approaches (e.g., Option 2) – Stress monitoring <ul style="list-style-type: none"> • field data are needed for adaptive management – Work with scientists - they are allies <ul style="list-style-type: none"> • Solicit input during planning and EIS work • Require formal peer review of Plan and Monitoring Results |

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| <p style="text-align: center;">Scientists’ Option #3</p> <ul style="list-style-type: none"> • Inspired by Option 2, but extended <ul style="list-style-type: none"> – Retain Option 2 approach and analyses • Emphasize monitoring (adaptive mgmt cycle) <ul style="list-style-type: none"> – Include scientists in design & evaluation of data • Require NEPA at Plan level <ul style="list-style-type: none"> – best level of analysis and best opportunity for input • Add standard for species viability (cf. Option 1) <ul style="list-style-type: none"> – Necessary component for ecological sustainability – Needed to assure Option 2 goals (community diversity) – Ties in naturally with monitoring & adaptive mgmt | <p style="text-align: center;">Scientists’ Option #3</p> <ul style="list-style-type: none"> • Move to firm standards: <ul style="list-style-type: none"> – ‘Analyses <i>must</i> evaluate the status of the char’s of ecosystem diversity . . .’ – ‘Evaluations <i>must</i> identify unique areas . . .’ – Char’s of species diversity - ‘<i>must include selected indicator taxa, interactive and rare species</i>’ – Eval of species diversity - ‘<i>on focal species selected to provide insights to the integrity of the larger ecosystem</i>’ – Eval of risk - Do individual species assessments, including <i>viability analyses</i> of selected focal & T&E species for which appropriate data exist |
| <p style="text-align: center;">Conclusion</p> <ul style="list-style-type: none"> • Option 2 provides key & needed analyses, but currently has many deficiencies <ul style="list-style-type: none"> – NEPA, opportunities for science input, etc. • These can be remedied via proposed extensions <ul style="list-style-type: none"> – Option 3 proposals • Species viability analysis is: <ul style="list-style-type: none"> – Necessary adjunct to coarse-filter approaches – advancing quickly - often provides a useful tool • Commitment to sustainability requires monitoring • Scientists often agree and are ready to help | |